



Richmond Hill Naturalists

27A – 81 Northern Heights Drive
Richmond Hill, ON L4B 4C9
nhelferty@rogers.com

June 12, 2007

Re: Summit Golf & Country Club Forest Conservation By-Law Application

Dear Mayor Emmerson,

It has come to the attention of the Richmond Hill Naturalists that Summit Golf & Country Club has applied for an exemption to the Region of York's Forest Conservation By-Law for hearing June 13, 2007 at the Transportation & Works Committee.

We have read the Report of the Commissioner and agree with staff recommendations to turn down the application for tree removal in the Jefferson Forest.

For over 50 years in Richmond Hill and southern York Region we have actively sought to protect our natural heritage. In particular, we were Participants in the Ontario Municipal Board hearing in Oak Ridges in 2000. As the Past President of the club and a professional ecological consultant, I have provided information on wildlife studies to the Region of York in the Jefferson Forest.

On April 3, 2000, I found a live Jefferson salamander crossing Stouffville Road about one kilometre east of Bayview Avenue, a new northern range extension for the species. This occurred prior to the OMB hearing in Oak Ridges of which I was an expert witness for Save the Rouge, funded by the City of Toronto. I now sit on the provincial Jefferson Salamander Recovery Team to oversee the development of the Recovery Strategy as a legal requirement under Canada's Species At Risk Act as well as the newly passed Ontario Endangered Species Act (Royal Assent May 16, 2007). I am quite familiar with the Jefferson Salamander in Jefferson Forest.

Having also found salamander roadkill one kilometre west of Bayview Avenue the following spring 2001, I immediately notified the Region to inform them of the likely migration north of Summit Golf course at that time given the imminent tendering of the contract for the Bayview extension.

Having reviewed the Report of the Commissioner, it is worth noting that the four Environmental Impact Study (EIS) field dates (pp. 7) were Oct 6, Nov 13, 2006 and Jun 7, Jun 29, 2006. These dates are inadequate for finding Jefferson Salamanders, which are subterranean salamanders (aka mole salamanders) that live underground most of the year. They come out primarily in early spring (March – April) to migrate to breeding wetlands, and do so only on wet nights. I have my field notes that were submitted to the OMB, but were not requested by Summit's consultant.

The issue of inappropriate field survey dates should not be lost on this Committee. It was the issue that prompted me and Save the Rouge to undertake a request for a Judicial Review of the Environmental Assessment for the Bayview Extension through the Jefferson Forest in Ontario Superior Court in 2002. In that EA, the consultant was a bird surveyor sent also to look for amphibians on warm, sunny mornings in June, during bird breeding survey conditions, which are inappropriate times and weather conditions to find amphibians.

Except for the possible October date where Juvenile salamanders possibly could be found with diligent searching through moist leaf litter and under logs, none of the dates coincides with surface activity of salamanders in forests. Salamanders seek out hibernation sites when cold rainy autumn weather hits in October, with rare fall surface movements seen at this time of year.

Given the known existence of Jefferson salamander, regulated as a 'Threatened' species under the Endangered Species Act and SARA, it would be imprudent to remove forest habitat that could support Jefferson salamanders. Both subterranean overwintering habitat as well as feeding and migration habitat is composed of mature deciduous and mixed forest habitat. Although salamanders will cross open areas such as fields and roads while on migration, as seen in the Oak Ridges area where mature forest habitat is separated from ideal breeding wetlands by agricultural fields and roads like Stouffville Road.

Given that our club or myself as a consultant were not sought out by Summit for known knowledge about Jefferson Salamander or other species like Red-shouldered hawk breeding in Jefferson Forest, we can only surmise that pertinent information is lacking in the EIS to evaluate the impact of the forest habitat being considered for removal. As well, in an EIS, indirect impacts of forest cover removal needs to be evaluated that can contribute to further drying of soil and loss of prey for species. Fragmentation, which is the simultaneous loss and isolation of remnant forest blocks, can have a real impact on small animals that are required to migrate. Salamanders in particular are prone to desiccation and also predation when exposed in open conditions while on migration.

Given that the Report of the Commissioner shows a decision-making tree under the Forest Conservation By-law that would automatically deny the application, it is disconcerting to our club that any further consideration of forest removal would even be allowed in an Oak Ridges Moraine Core area, even with the 'existing use' ambiguity in language. We feel that the spirit of the act, as well as all relevant policies to protect natural heritage and habitat of species at risk in particular, including the Greening of York policies, should be the foundation of decision-making that would oppose further forest removal in York Region.

We would like to see York Region at the 'cutting edge', just as the Jefferson salamander in Jefferson Forest is at the 'cutting edge' of its northern range limit in Jefferson Forest in Richmond Hill. The Jefferson salamander ranges down to its southern range limit at 32° 52'N in the Jefferson National Forest in Wise County, Virginia. We would like to think that York Region is the northern 'Wise County'—your decision today will tell us if you are as wise as President Thomas Jefferson himself, an avid naturalist in Virginia and namesake of the salamander.

Thank you for continuing your support of the Oak Ridges Moraine and its flora and fauna. Please feel free to contact me during the day at Ontario Nature at 416-444-8419 where I am the new Director of Policy and Campaigns.

Sincerely,



Natalie Helferty
Past President